

EXHIBIT 8

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X
5 SANDRA GUZMAN,

6 Plaintiff,

7 -against- 09CIV9323

8 (BSJ) (RLE)

9 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
10 THE NEW YORK POST, and COL ALLAN, in his
11 official and individual capacities,
12 Defendants.

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16 DEPOSITION OF LES GOODSTEIN

17 New York, New York

18 June 15, 2012
19

20 Reported by:

21 MARY F. BOWMAN, RPR, CRR

22 JOB NO. 50553
23
24
25

<p style="text-align: right;">Page 22</p> <p>1 GOODSTEIN</p> <p>2 A. Yes.</p> <p>3 Q. What was that? What was the next</p> <p>4 one?</p> <p>5 A. Executive vice president, executive</p> <p>6 vice president.</p> <p>7 Q. Of the Daily News?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recall what year you became</p> <p>10 executive vice president?</p> <p>11 A. '96.</p> <p>12 Q. How long were you executive vice</p> <p>13 president?</p> <p>14 A. About four years.</p> <p>15 Q. Did you have any other positions at</p> <p>16 the Daily News after the four years as</p> <p>17 executive vice president?</p> <p>18 A. Yes.</p> <p>19 Q. What was that?</p> <p>20 A. President, chief operating officer.</p> <p>21 Q. How long were you president and</p> <p>22 chief operating officer?</p> <p>23 A. Five or six years.</p> <p>24 Q. Did you have any other positions at</p> <p>25 the Daily News after president, chief</p>	<p style="text-align: right;">Page 23</p> <p>1 GOODSTEIN</p> <p>2 operating officer?</p> <p>3 A. That was it.</p> <p>4 Q. There was pretty much no place else</p> <p>5 to go, right?</p> <p>6 MR. LERNER: Objection.</p> <p>7 Q. Was there -- was there anyone above</p> <p>8 you when you were president and chief</p> <p>9 operating officer? Did you have a supervisor?</p> <p>10 A. Yes.</p> <p>11 MR. LERNER: Objection.</p> <p>12 Q. Who was that?</p> <p>13 A. Mort Zuckerman.</p> <p>14 Q. Where did you go after you left as</p> <p>15 president of the Daily News?</p> <p>16 A. News America Incorporated.</p> <p>17 Q. And tell me who Mort Zuckerman is?</p> <p>18 A. Mort Zuckerman was the owner of the</p> <p>19 Daily News. He is also the chairman of the</p> <p>20 Boston Properties.</p> <p>21 Q. You said after you left the Daily</p> <p>22 News, you went to News America Incorporated?</p> <p>23 A. Yes.</p> <p>24 Q. Is that correct?</p> <p>25 Who hired you for this position?</p>
<p style="text-align: right;">Page 24</p> <p>1 GOODSTEIN</p> <p>2 A. Paul Carlucci.</p> <p>3 Q. And is, has your position changed</p> <p>4 since Paul Carlucci hired you?</p> <p>5 MR. LERNER: Objection.</p> <p>6 You can answer.</p> <p>7 A. Repeat the question.</p> <p>8 Q. Let me back up. What year did Paul</p> <p>9 Carlucci hire you?</p> <p>10 A. 2005. Started in 2006.</p> <p>11 Q. So I believe you said before that</p> <p>12 you have had the same position for the last</p> <p>13 six and a half years, correct?</p> <p>14 A. Yes.</p> <p>15 Q. So my question is since Paul</p> <p>16 Carlucci hired you in 2005, started in 2006,</p> <p>17 has your job title changed in that period of</p> <p>18 time?</p> <p>19 MR. LERNER: Objection.</p> <p>20 You can answer.</p> <p>21 A. No.</p> <p>22 Q. Who is your current supervisor at</p> <p>23 your current position?</p> <p>24 A. Paul Carlucci.</p> <p>25 Q. Has anyone else ever been your</p>	<p style="text-align: right;">Page 25</p> <p>1 GOODSTEIN</p> <p>2 supervisor at your current position, other</p> <p>3 than Paul Carlucci?</p> <p>4 A. No.</p> <p>5 Q. Have you ever known News</p> <p>6 Corporation to mislead the public?</p> <p>7 MR. LERNER: Objection.</p> <p>8 A. No.</p> <p>9 Q. Have you ever known News</p> <p>10 Corporation to issue a false press release?</p> <p>11 MR. LERNER: Objection.</p> <p>12 A. The answer is no.</p> <p>13 Q. Would you agree that if News</p> <p>14 Corporation were to issue a false press</p> <p>15 release, that would be unethical?</p> <p>16 MR. LERNER: Objection.</p> <p>17 A. I don't understand your question.</p> <p>18 Q. Do you think it would be wrong to</p> <p>19 issue a press release which was false?</p> <p>20 MR. LERNER: Objection.</p> <p>21 A. The answer is no.</p> <p>22 Q. You don't believe it would be</p> <p>23 wrong?</p> <p>24 A. Can I have the question again.</p> <p>25 Q. Read the question back.</p>

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<p>1 GOODSTEIN</p> <p>2 Q. Did any employees other than News</p> <p>3 America marketing employees move to 1185</p> <p>4 sixth avenue?</p> <p>5 A. I don't understand your question.</p> <p>6 What period of time, when?</p> <p>7 Q. In October 2008, when you moved to</p> <p>8 1185 Sixth Avenue, was it, would anyone else</p> <p>9 from 1211 move to 1185 other than News</p> <p>10 America Marketing employees?</p> <p>11 MR. LERNER: Objection.</p> <p>12 A. Not that I'm aware of.</p> <p>13 Q. So the only office you ever had at</p> <p>14 1211 was on the fifth floor?</p> <p>15 A. Yes.</p> <p>16 Q. Just briefly, can you tell me what</p> <p>17 your duties were in terms of being an advisor</p> <p>18 to the New York Post?</p> <p>19 A. I had -- I came from the Daily</p> <p>20 News. I had a lot of experience in the</p> <p>21 newspaper business, so as an advisor, I</p> <p>22 helped the New York Post get accounts, for</p> <p>23 example, advertising accounts that they were</p> <p>24 having difficulty getting. I helped in some</p> <p>25 strategies for the New York Post. I helped</p>	<p>1 GOODSTEIN</p> <p>2 with Tempo. And I did basically what I was</p> <p>3 asked to do in areas that I could help.</p> <p>4 Q. So when you say you did what you</p> <p>5 were asked to do, it was a fairly broad</p> <p>6 assignment? It could be a lot of different</p> <p>7 things?</p> <p>8 A. Reasonably. Mostly confined to</p> <p>9 advertising. A little bit on circulation but</p> <p>10 not a lot.</p> <p>11 Q. The second thing you mentioned was</p> <p>12 acquired the community newspapers?</p> <p>13 A. Yes.</p> <p>14 Q. When did you acquire the community</p> <p>15 newspapers?</p> <p>16 A. There were three dates that I</p> <p>17 recall we acquired a whole series of</p> <p>18 community newspapers. So the first date was</p> <p>19 October of 2006, we acquired two groups. One</p> <p>20 group was called the Times Ledger newspapers</p> <p>21 which were located in Queens. The other</p> <p>22 group was in Brooklyn called Courier Life.</p> <p>23 We then made another acquisition in</p> <p>24 July of '07, we acquired the Bronx Times, and</p> <p>25 in about a year later, we acquired an entity</p>
Page 80	Page 81
<p>1 GOODSTEIN</p> <p>2 known as the Brooklyn Paper.</p> <p>3 Q. In your capacity as -- well, I</p> <p>4 guess, did you have like a specific title in</p> <p>5 reference to the community newspapers?</p> <p>6 MR. LERNER: Objection, form.</p> <p>7 Q. In other words, did they call you</p> <p>8 something in particular, like you were the</p> <p>9 director of community newspapers, anything</p> <p>10 like that?</p> <p>11 A. No.</p> <p>12 Q. In your capacity as -- well,</p> <p>13 actually strike that.</p> <p>14 You are said you acquired the</p> <p>15 community newspapers. Did you have any</p> <p>16 further role with respect to the community</p> <p>17 newspapers once they were acquired?</p> <p>18 MR. LERNER: Objection.</p> <p>19 You can answer.</p> <p>20 A. Yes.</p> <p>21 Q. What was that?</p> <p>22 A. I ran the businesses. I am sorry,</p> <p>23 I need another, a bathroom break. I am</p> <p>24 terribly sorry. It will just take me a</p> <p>25 minute.</p>	<p>1 GOODSTEIN</p> <p>2 MR. LERNER: No apology necessary,</p> <p>3 Les.</p> <p>4 THE VIDEOGRAPHER: Going off the</p> <p>5 record, the time is 12:32.</p> <p>6 (Recess)</p> <p>7 THE VIDEOGRAPHER: Back on the</p> <p>8 record, the time is 12:35 p.m.</p> <p>9 Q. Mr. Goodstein, who owns these</p> <p>10 community newspapers?</p> <p>11 A. I don't know.</p> <p>12 Q. You don't know -- do you know who</p> <p>13 owns any of them?</p> <p>14 A. I don't know.</p> <p>15 Q. Are they all owned by one entity or</p> <p>16 owned by multiple entities?</p> <p>17 A. I'm not sure.</p> <p>18 Q. Do you know if they are owned by</p> <p>19 one or more of the News Corp. conglomerate of</p> <p>20 organizations?</p> <p>21 MR. LERNER: Objection.</p> <p>22 A. I don't know. I don't know who</p> <p>23 owns, which entity owns the papers.</p> <p>24 Q. But you don't even know if they are</p> <p>25 a News Corp. product or -- strike that.</p>